

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

DR. STEPHEN T. SKOLY, Jr.,

Plaintiff,

v.

DANIEL J. MCKEE, in his official
capacity as the Governor of the State of
Rhode Island; and JAMES McDONALD,
in his official capacity as the Interim
Director of the Rhode Island Department
of Health,

Defendants.

C.A. 1:22-cv-00058-MSM-LDA

**Unopposed Motion to Extend Time for Filing Plaintiff's Response to Motion
to Dismiss**

Pursuant to Fed. R. Civ. Pro. 6(b) Plaintiff, Dr. Stephen Skoly respectfully moves for a forty-nine (49) day extension of time within which to file Plaintiff's Response to Defendant's Motion to Dismiss. In support of this motion, Plaintiff states as follows:

1. In accordance with Local Rule Fed. R. Civ. Pro. 12(B)(6), Defendant's filed a Motion to Dismiss on October 28, 2022.
2. According to L.R. Civ. P. 7, the Plaintiff's Response to the Motion to Dismiss is due November 11th, 2023.
3. As of October 31, 2022, the previous counsel has retired.
4. New counsel has not had ample time to familiarize himself with the case.

5. The new lead counsel is a law professor and has several immovable end-of-semester commitments.
6. The new lead counsel has a pre-planned academic trip out of the country from December 7th through the 26th.
7. The requested extension of time will permit Plaintiff's new lead counsel to craft legal arguments with precision so as to both discharge the duty to his client and assist the Court in resolving this matter.
8. Plaintiff's counsel has spoken to opposing counsel, Michael Field, who indicated that Defendant's counsel consent to the relief requested.

For the reasons stated herein, Plaintiff respectfully requests that the Court extend the time to file Plaintiff's Response to the Motion to Dismiss by forty-nine (49) days, up to and including **January 9th, 2022.**

Respectfully submitted, this 9th day of November, 2022.

/s/ Gregory Piccirilli
Gregory Piccirilli
148 Atwood Avenue #302
Cranston, RI 02920
(401) 578-3340

Attorney for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Gregory Piccirilli
Gregory Piccirilli
148 Atwood Avenue #302
Cranston, RI 02920
(401) 578-3340

Attorney for the Plaintiff